

December 10, 2019

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

Re: Petition of the South Carolina Office of Regulatory Staff for a Rulemaking Proceeding to  
Determine Appropriate Parameters and Standards Regarding a Utility's Use of Customer  
Data  
Docket No. 2019-367-A

Dear Ms. Boyd:

Enclosed for filing please find a Petition to Intervene on behalf of Piedmont Natural Gas Company, Inc. in the above-referenced docket. By copy of this letter we are serving the same on the parties of record.

Thank you for your assistance with this matter. If you have any questions regarding this filing, you may reach me at the number shown above.

Sincerely,

/s/ Jasmine K. Gardner  
Jasmine K. Gardner

JKG/sko

cc: All Parties of Record  
ORS  
Bruce Barkley  
Pia Powers

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**Docket No. 2019-367-A**

**IN RE:**

<b>Petition of the South Carolina Office of Regulatory Staff for a Rulemaking Proceeding to Determine Appropriate Parameters and Standards Regarding a Utility's Use of Customer Data</b>	) ) ) ) ) )	<b>PETITION TO INTERVENE OF PIEDMONT NATURAL GAS COMPANY, INC.</b>
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Piedmont Natural Gas Company, Inc. ("Piedmont") hereby files with the Public Service Commission of South Carolina ("Commission") this Petition, pursuant to S.C. Code Reg. 103-825 (2019), and other applicable provisions of the Commission's Rules of Practice and Procedure, for permission to intervene in the above-captioned proceeding.

In support of this Petition, Piedmont respectfully shows unto the Commission the following key facts:

1. It is respectfully requested that any notices or other communications with respect to this Petition be sent to:

Jasmine K. Gardner  
McGuireWoods LLP  
201 North Tryon Street, Suite 3000  
Charlotte, North Carolina 28202  
Telephone: (704) 343-2262

2. Piedmont is a subsidiary of Duke Energy Corporation and is engaged in the business of transporting, distributing and selling natural gas in the states of South Carolina, North Carolina and Tennessee. Piedmont is a public utility under the laws of this State, and its public utility operations in South Carolina are subject to the jurisdiction of this Commission.

3. By Petition dated November 27, 2019, the South Carolina Office of Regulatory Staff (“ORS”) filed a Petition for Rulemaking Proceeding with the Commission to determine appropriate parameters and standards regarding a utility’s use of customer data.

4. Piedmont has a substantial and material interest in the subject matter of the above-captioned proceeding, in that the outcome of the proceeding will directly impact Piedmont. As a public utility, Piedmont is subject to the regulatory authority of the Commission pursuant to Title 68 of the Code of Laws of South Carolina. Piedmont’s interests are directly affected by the outcome of this proceeding and cannot be adequately represented by any other party. Accordingly, Piedmont submits that good cause exists for the Commission to allow the Company to participate as a party in the above-captioned proceeding.

5. Piedmont has not developed a position in this matter, but reserves the right to modify, amend or expand any position the Company develops during the course of this proceeding.

WHEREFORE, Piedmont respectfully requests that the Commission issue an order: (i) granting the Company’s petition to intervene in this matter and participate fully in the Docket and any hearing to be scheduled in this matter, (ii) granting Piedmont all rights attendant to intervenor status, including the right to be provided copies of all filings, pleadings, testimony, and exhibits, and (iii) granting such other and further relief as is just and proper.

**[SIGNATURE PAGE FOLLOWS]**

Respectfully submitted this 10th day of December, 2019.

**Piedmont Natural Gas Company, Inc.**

/s/ Jasmine K. Gardner  
Jasmine K. Gardner (S.C. Bar # 102168)  
McGuireWoods LLP  
201 North Tryon Street, Suite 3000  
Charlotte, North Carolina 28202  
Telephone: (704) 343-2262

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the attached is being served this date upon all of the parties to this docket electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the addresses contained in the official service list in this proceeding.

This the 10th day of December, 2019.

/s/ Sloane K. O'Hare  
Sloane K. O'Hare